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Federal Communications Commission

Re: WT Docket No. 05-235

I have reviewed the referenced docket with interest and would like to file my comment as opposing the elimination of the code proficiency testing requirement for Amateur Radio Licensing in the United States.

As a licensed amateur since age thirteen (forty years ago) and an active operator all those years, I see the value in retaining the code examination for the reasons discussed herein. In fact, I was opposed to the reduction in this requirement from 13 wpm and 20 wpm for the General and Extra Class licenses for the reasons also stipulated.

No reasonable alternative

Like the “behind the wheel” test required for automotive drivers licenses in all fifty states, the code proficiency test is the only reasonable skills test for amateur radio licensing. There is no other test of operating skill or practice, and no alternative is being offered by the current Docket.

We already have amateur radio bands populated to some degree by users who have the worst possible operating practices; we try to guide them along and train them to become better operators, but some lack the discipline required and will never be good operators. Of those, it is my findings the majority who lack such discipline are the “code free” licensees who also didn’t find the discipline to learn a very simple skill such as the 45 characters or symbols required for routine communications using the international (Morse) code.

Possibly a different type of operating skill demonstration and test would make an excellent substitute for the “code” test; but none has been proposed, and most would be very subjective. The simple demonstration of code knowledge is a more objective, less time-consuming test methodology that has worked well for nine decades.

Emergency communications

As was recently demonstrated during the Tsunami event in the Indian Ocean region earlier this year, “CW” (communications via hand-sent and human-decoded Morse over wireless) very successfully passed hundreds, possibly thousands, of emergency messages by those closest to the disaster. The reasons code was used rather than other means include: (i) It was the only means available, using simple and limited amateur equipment; (ii) The mode penetrates noise, static and fading better than voice modes and as well as more sophisticated (modern) digital modes, but requires less complex equipment and consumes less power; (iii) In an international disaster where those affected speak several (different) languages and won’t necessarily understand each other, “international code,” making use of simple abbreviations, symbols and well-understood signals, allows for ready communications amongst and between operators of different nationalities. All of these reasons came into play in the recent Tsunami event.

HF is different

While it may be argued that international communications is probably rare using VHF-UHF-SHF-EHF, it is very common using HF. We as amateur operators are exposing ourselves to the entire world every time we use frequency bands providing global propagation, as the frequencies below 30 MHz often do. Only our best foot should be forward in this part of the spectrum, and only our best operators, who have demonstrated some operating proficiency, should be allowed voice privileges here.

The now-defunct “Novice Class” amateur license, popular for five decades, was a perfect introduction to the world of high frequency global propagation and provided a proving ground for new amateurs to learn and experiment without embarrassing our nation on a worldwide platform. We as Novices were permitted low-powered “CW” (code) communications *only*. The average global citizen with a shortwave receiver could not understand what we were sending, so if we made mistakes, those mistakes were kept fairly private, among the amateur community. Allowing operators higher-powered voice privileges does not contain mistakes nearly so well.

The American Exception

It may also be argued that ITU has now provided for “codeless” amateur operators to use the HF spectrum, as of WARC 2003, and of course that’s true. However, we as Americans should rise above that; we need not participate in deregulation if we choose not to. France has some of the most highly skilled amateur operators in the world – you can hear it in their attitudes and methods – and has chosen to *not* deregulate. They have

maintained a code-test requirement for amateur licensing. So should we, in America.

In closing, I urge FCC to reconsider the applicable RMs (RM10781-10787; RM10805-10811; RM10867-10870) and to *not* further deregulate the amateur radio service licensing process in the United States by eliminating the code test requirement.

Best regards,

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